

1. On May 23, 2014, the government filed a Complaint and affidavit charging defendant Christine Yoder with production of child pornography, distribution of child pornography, and attempted enticement, in violation of 18 U.S.C. §§ 2251, 2252A, and 2422. Later that day, agents arrested the defendant. On May 27, 2014, the defendant made her initial appearance before the Honorable Carol Sandra Moore Wells. On May 30, 2014, following a hearing, the Court found probable cause for the charges and detained the defendant pending trial. On June 18, 2014, the Honorable Jacob P. Hart granted a joint motion to continue the time within which to file an indictment or information beyond the last date that would otherwise be required under the Speedy Trial Act, to and including July 23, 2014. On July 23, 2014, the Honorable Lynne A. Sitarski granted a joint motion to continue the time within which to file an indictment or information beyond the last date that would otherwise be required under the Speedy Trial Act, to

and including September 12, 2014.

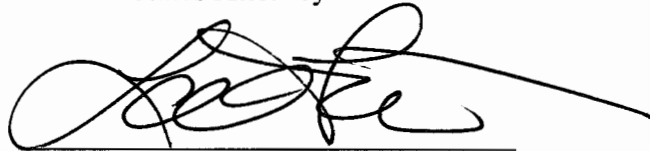
2. The parties are discussing a possible resolution of this matter that would result in less litigation and more efficient use of the Court's resources. In particular, the government recently has obtained certain materials that it has been able to share with the defendant for purposes of these discussions. The parties are seeking an extension of time to continue these discussions to and including October 31, 2014.

3. Counsel for the defendant, Elizabeth Toplin, has advised the government that on behalf of the defendant, she joins in this motion and authorizes the government to file this joint motion under the signature of government counsel.

WHEREFORE, the government and the defendant respectfully submit that the ends of justice will best be served by an extension of time within which to file an indictment or information beyond the last date that would otherwise be required under the Speedy Trial Act, to and including October 31, 2014.

Respectfully submitted,

ZANE DAVID MEMEGER
United States Attorney

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LOUIS D. LAPPEN
First Assistant United States Attorney

Dated: September 11, 2014

CERTIFICATE OF SERVICE

I certify that on this date the above joint motion for second extension of time was filed electronically on the Electronic Case Filing system, is available for viewing and downloading from the ECF system, and/or was served electronically on the following:

Elizabeth Toplin, Esq.
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LOUIS D. LAPPEN
First Assistant United States Attorney

Date: September 11, 2014